

EXHIBIT A1

May 14, 2024, Email from Meirav Werbel, AAA, to Gary E.
Mason & Charles B. Casper



AMERICAN
ARBITRATION
ASSOCIATION®

INTERNATIONAL CENTRE
FOR DISPUTE RESOLUTION®

Northeast Case Management Center
Heather Santo
Vice President
1301 Atwood Avenue, Suite 211N
Johnston, RI 02919
Telephone: (866)293-4053

May 14, 2024

Gary E. Mason, Esq.
Mason, LLP
5335 Wisconsin Avenue NorthWest, Suite 640
Washington, DC 20016
Via Email to: gmason@masonllp.com

Charles B. Casper, Esq.
Montgomery McCracken Walker & Rhoads, LLP
1735 Market Street
Philadelphia, PA 19103-7505
Via Email to: ccasper@mmwr.com

Case Number: 01-23-0005-8758

19,911 Individual Claimants¹
-vs-
Valve Corporation

Dear Parties:

The American Arbitration Association (AAA) confirms receipt of the parties' submissions dated April 19, 2024, in which Claimants request the appointment of a Process Arbitrator, while Respondent opposes such appointment.

In Claimants' submission, they request that a Process Arbitrator be appointed to determine the Reimbursement of AAA Filing Fees, the Enforceability of the Arbitration Agreement and the Scope of Discovery. In addition, they oppose the appointment of a Process Arbitrator to determine a prospective Motion to Dismiss by Respondent. In Respondent's submission, they oppose the appointment of a Process Arbitrator on each of the issues identified by Claimants and confirmed that they are not seeking a Process Arbitrator to rule on a prospective Motion to Dismiss.

After careful review of the parties' submissions and MA-6 of the Mass Arbitration Supplementary Rules, effective August 1, 2023, the AAA has determined the issues submitted are not administrative issues and can be presented to Merits Arbitrators upon their appointment. Therefore, the AAA will not appoint a Process Arbitrator to hear and determine the issues submitted by the 14,911 individual claimants whose demands for arbitration were received on December 6, 2023, December 12, 2023 and December 19, 2023.

The next administrative step for these 14,911 individual claimants is the selection of the Merits Arbitrators. An administrative conference call is scheduled to discuss this process with the parties on **May 23, 2024 at 12:00 pm Eastern Time**. The call information is:

Telephone Number: +1 (855) 633-2040

¹ In their first round of filings, Claimants filed a total of 14,911 individual demands for arbitration on December 6, 2023, December 12, 2023 and December 19, 2023. Claimants filed an additional 5,000 individual demands for arbitration on April 26, 2024.

Access Code: 2486784#

The parties should also be prepared to discuss the next administrative steps for the 5,000 additional individual demands filed by Claimants on April 26, 2024. Please note that the [Mass Arbitration Supplementary Rules](#) as effective April 1, 2024 apply to the matters received on April 26, 2024.

We encourage the parties to meet and confer prior to this call to identify any agreements between the parties that will facilitate an efficient and streamlined arbitrator selection process.

Additionally, the Case Management Fee of \$1,400 for each of the 14,911 cases must be paid prior to the arbitrator selection process. An invoice will be provided separately.

I would like to remind the parties that Global Mediation is still available and the AAA has many sophisticated mediators who can help the parties resolve these cases or in the alternative, mediate the pending issues referenced above. Attached are some resumes of AAA mediators for the parties to consider.

If you have any questions, please feel free to contact me.

Sincerely,

/s/

Meirav Werbel

Senior Case Administrator

Direct Dial: (401)414-5522

Email: MeiravWerbel@adr.org

Supervisor Information: Victoria Chandler | Director of ADR Operations | e: VictoriaChandler@adr.org

cc: Douglas Matthews
Timothy B. McGranor
Lauren Sheller
Theodore B. Bell
Kenneth J. Rubin, Esq.
Jeremy Mishkin, Esq.
John G. Papianou, Esq.
Benjamin Goldman
Kara M. Mundy, Esq.
Danielle L. Perry, Esq.
Robert E. Day